

# EXHIBIT A

STATE OF WISCONSIN

CIRCUIT COURT

MILWAUKEE COUNTY

DAVID A. PARAJECKI,  
2903 South 85<sup>th</sup> Street  
West Allis, Wisconsin 53229

CASE NO.

14CV002193

Plaintiff,

v.

**SUMMONS**

**HELLERMANN TYTON CORPORATION**  
with David W. Sladsky as its registered agent  
7930 North Faulkner Road  
Milwaukee, Wisconsin 53224 his registered address

Case Code: 30303

Defendant.

**HON. CHRISTOPHER R. FOLEY, BR. 14**

**CIVIL E**

**THE STATE OF WISCONSIN TO SAID DEFENDANT:**

You are hereby notified that the plaintiff named above has filed a lawsuit or other legal action against you. The Complaint, which is attached, states the nature and basis of the legal action.

Within twenty (20) days of receiving this summons, you must respond with a written answer, as that term is used in chapter 802, Stats., to the Complaint. The Court may reject or disregard an answer that does not follow the requirements of the statutes. The answer must be sent or delivered to this Court, whose address is Milwaukee County Courthouse, 901 North Ninth Street, Milwaukee, Wisconsin 53233 and to Attorney Thomas W. LaFave, whose address is 7177 North Port Washington Road, Suite 210, Milwaukee, Wisconsin 53217. You may have an attorney help or represent you.

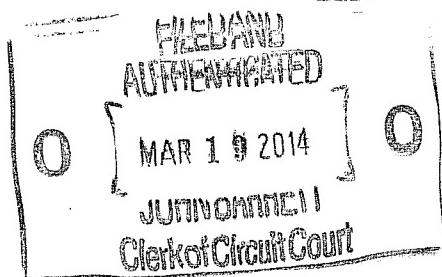
If you do not provide a proper response within twenty (20) days, the Court may grant a judgment against you for the award of money or other legal action requested in the Complaint, or you may lose your right to object to anything that is or may be incorrect in the Complaint. A judgment may be enforced as provided by law. A judgment awarding money may become a lien against any real estate you own now or in the future and may also be enforced by garnishment of wages or seizure of property.

**MALM & LaFAVE, S.C.**  
Attorneys for the Plaintiff

By:

Thomas W. LaFave  
State Bar No. 1016648

Malm & LaFave, S.C.  
7177 North Port Washington Road  
Suite 210  
Milwaukee, Wisconsin 53217  
Telephone: (414) 228-5250  
Facsimile: (414) 352-8085  
Email: [twl@lafavelaw.net](mailto:twl@lafavelaw.net)



STATE OF WISCONSIN

CIRCUIT COURT

MILWAUKEE COUNTY  
14CV002193

**DAVID A. PARAJECKI,**

Plaintiff,

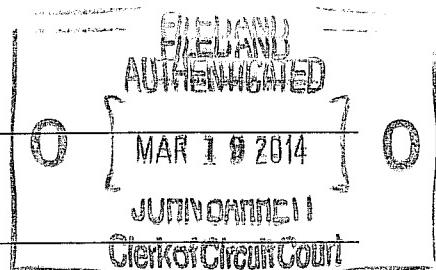
CASE NO:

v.

**HELLERMANN TYTON CORPORATION,**  
with David W. Sladsky as its registered agent and  
his registered address is  
7930 North Faulkner Road  
Milwaukee, Wisconsin 53224

Defendants.

**COMPLAINT, DEMAND FOR  
JURY TRIAL AND PLAINTIFF'S  
FIRST SET OF INTERROGATORIES**



NOW COMES the plaintiff, by and through his attorneys, Malm & LaFave, S.C. and make the following complaint against the defendants as follows:

1. The Plaintiff, David A. Parajecki (hereinafter "Plaintiff") is an adult residing at 2903 South 85<sup>th</sup> Street, Milwaukee, WI 53229.
2. Defendant, upon information and belief, is a foreign corporation licensed to do business in the state of Wisconsin, and its registered agent is David W. Sladsky and his registered address is 7930 North Faulkner Road, Milwaukee, Wisconsin 53224.
3. Plaintiff was an employee with Defendant for many years. At all times relevant to this lawsuit, Plaintiff was designated a non-exempt employee under the federal Fair Labor Standards Act (FLSA) 29 U.S.C. 201, et. seq.

4. For a period of at least two years prior to his employment termination on March 22, 2013, Plaintiff worked approximately five hours of overtime each week. Plaintiff's regular hourly rate of pay was \$22.83.

5. Plaintiff was never paid any overtime pay for these hours and defendant's failure to pay the overtime was willful.

6. In addition, the defendant promised to pay plaintiff a sum of money equal to 5% of his gross 2011 salary (\$2,374) if the plaintiff met three goals in 2012.

7. Relying on the promise, the plaintiff achieved the goals in 2012 but the defendant refuses and neglects to pay plaintiff said sum.

8. The promised bonus is not a discretionary bonus under the FLSA.

**WHEREFORE**, Plaintiff demands judgment against the Defendant for unpaid overtime wages ( $22.38 \times 1.5 \times 5 \times 52 \times 2 = \$17,456.40$ ), plus the incentive pay of \$2,374.00, and an amount equal thereto as liquidated damages pursuant to 29 USC. 216(b) for a grand total of \$39,666.80 and reasonable attorney's fees pursuant to said section and for his costs and disbursements as provided by law and any other relief the Court deems just and equitable.

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands trial by a 12 member jury.

**PLAINTIFF'S FIRST SET OF  
INTERROGATORIES**

Pursuant to the provisions of Wis. Stat. §804.08, plaintiff propounds the following Interrogatories to the Defendant:

1. Does the defendant's computer records show when the plaintiff began performing services for the two year period prior to his employment termination?

2. If you answered yes, then what do these records show as the start time for plaintiff's services for March 22, 2010 through March 22, 2012?

**MALM & LaFAVE, S.C.**

By:

  
Thomas W. LaFave  
State Bar No. 1016648

Post Office Address

Malm & LaFave, S.C.  
7177 North Port Washington Road  
Suite 210  
Milwaukee, Wisconsin 53217  
Telephone: (414) 228-5250  
Facsimile: (414) 352-8085  
E-Mail [TWL@LAFAVELAW.NET](mailto:TWL@LAFAVELAW.NET)